



ROBINSON MCFADDEN
ATTORNEYS AND COUNSELORS AT LAW

ROBINSON, MCFADDEN & MOORE, P.C.
COLUMBIA, SOUTH CAROLINA

November 7, 2008

VIA ELECTRONIC FILING

Mr. Charles Terreni
Chief Clerk of the Commission
Public Service Commission of South Carolina
Synergy Business Park, Saluda Building
101 Executive Center Drive
Columbia, SC 29210

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**Re: Time Warner Cable Information Services Application to Amend its
Certificate to Provide Telephone Services in the Service Area of
PBT Telecom, Inc.
Docket No. 2008-328-C**

Dear Mr. Terreni:

Enclosed for filing please find Time Warner Cable Information Services' 2nd Discovery Requests to PBT Telecom, Inc. in the above referenced docket. By copy of this letter we are serving the same on counsel for PBT Telecom, Inc. by hand delivery. Should you have any questions, please contact me.

Yours truly,

ROBINSON, MCFADDEN & MOORE, P.C.

Frank R. Ellerbe, III

FRE/bds
Enclosures

cc/enc: Julie Patterson Laine (via email)
Ms. Charlene Keys (via email)
M. John Bowen, Jr., Esquire (via hand delivery & email)
Margaret M. Fox, Esquire (via hand delivery & email)
Nanette S. Edwards, Esquire (via email & U.S. Mail)
Jeffrey M. Nelson, Esquire (via email & U.S. Mail)

STATE OF SOUTH CAROLINA

**In Re: Application of Time Warner Cable
Information Services (South Carolina) LLC, d/b/a
Time Warner Cable to Amend its Certificate of
Public Convenience and Necessity to Provide
Telephone Services in the Service Area of PBT
Telecom, Inc. and for Alternative Regulation**

**BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA**

COVER SHEET

**DOCKET
NUMBER: 2008-328-C**

(Please type or print)

Submitted by: Frank R. Ellerbe, III**SC Bar Number:** 1866

Address: Robinson, McFadden & Moore, P.C.
PO Box 944
Columbia, SC 29202

Telephone: (803) 779-8900**Fax:** (803) 252-0724**Other:****Email:** fellerbe@robinsonlaw.com

NOTE: The cover sheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for use by the Public Service Commission of South Carolina for the purpose of docketing and must be filled out completely.

DOCKETING INFORMATION (Check all that apply)

☐ **Emergency Relief demanded in petition** ☐ **Request for item to be placed on Commission's Agenda expeditiously**

☐ **Other:** _____

INDUSTRY (Check one)	NATURE OF ACTION (Check all that apply)		
<input type="checkbox"/> Electric	<input type="checkbox"/> Affidavit	<input type="checkbox"/> Letter	<input type="checkbox"/> Request
<input type="checkbox"/> Electric/Gas	<input type="checkbox"/> Agreement	<input type="checkbox"/> Memorandum	<input type="checkbox"/> Request for Certificatio
<input type="checkbox"/> Electric/Telecommunications	<input type="checkbox"/> Answer	<input type="checkbox"/> Motion	<input type="checkbox"/> Request for Investigation
<input type="checkbox"/> Electric/Water	<input type="checkbox"/> Appellate Review	<input type="checkbox"/> Objection	<input type="checkbox"/> Resale Agreement
<input type="checkbox"/> Electric/Water/Telecom.	<input type="checkbox"/> Application	<input type="checkbox"/> Petition	<input type="checkbox"/> Resale Amendment
<input type="checkbox"/> Electric/Water/Sewer	<input type="checkbox"/> Brief	<input type="checkbox"/> Petition for Reconsideration	<input type="checkbox"/> Reservation Letter
<input type="checkbox"/> Gas	<input type="checkbox"/> Certificate	<input type="checkbox"/> Petition for Rulemaking	<input type="checkbox"/> Response
<input type="checkbox"/> Railroad	<input type="checkbox"/> Comments	<input type="checkbox"/> Petition for Rule to Show Cause	<input type="checkbox"/> Response to Discovery
<input type="checkbox"/> Sewer	<input type="checkbox"/> Complaint	<input type="checkbox"/> Petition to Intervene	<input type="checkbox"/> Return to Petition
<input checked="" type="checkbox"/> Telecommunications	<input type="checkbox"/> Consent Order	<input type="checkbox"/> Petition to Intervene Out of Time	<input type="checkbox"/> Stipulation
<input type="checkbox"/> Transportation	<input checked="" type="checkbox"/> Discovery	<input type="checkbox"/> Prefiled Testimony	<input type="checkbox"/> Subpoena
<input type="checkbox"/> Water	<input type="checkbox"/> Exhibit	<input type="checkbox"/> Promotion	<input type="checkbox"/> Tariff
<input type="checkbox"/> Water/Sewer	<input type="checkbox"/> Expedited Consideration	<input type="checkbox"/> Proposed Order	<input type="checkbox"/> Other:
<input type="checkbox"/> Administrative Matter	<input type="checkbox"/> Interconnection Agreement	<input type="checkbox"/> Protest	
<input type="checkbox"/> Other:	<input type="checkbox"/> Interconnection Amendment	<input type="checkbox"/> Publisher's Affidavit	
	<input type="checkbox"/> Late-Filed Exhibit	<input type="checkbox"/> Report	

**BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA**

Docket No. 2008-328-C

IN RE:	Application of Time Warner Cable Information)	
	Services (South Carolina), LLC, d/b/a Time)	TIME WARNER CABLE
	Warner Cable to amend its Certificate of Public)	INFORMATION SERVICES
	Convenience and Necessity to Provide)	2nd DISCOVERY REQUESTS
	Telephone Services in the Service Area of PBT)	TO PBT TELECOM, INC.
	Telecom, Inc., and for Alternative Regulation)	
)	

Pursuant to 26 S.C. Regs. 103-833 and other applicable rules of practice and procedure of the Public Service Commission of South Carolina ("Commission"), Time Warner Cable Information Services (South Carolina), LLC, d/b/a Time Warner Cable ("Time Warner Cable" or "Applicant") requests that PBT Telecom, Inc. ("PBT" or "Company") respond to the following interrogatories and/or requests for production within twenty days of service:

NO. 2-1

Please provide the underlying trial balances or general ledger reports that support the Company's Balance Sheets (or Statement of Financial Position), Income Statements (or Statements of Revenue and Expenses), and Statements of Cash Flow by individual general ledger account for each of the years 2003 – 2007. The requested schedules should be provided in a fully executable Microsoft Excel workbook that includes the Part 64 allocation between regulated and non-regulated operations and the Part 36 allocations between inter and intrastate jurisdictions.

NO. 2-2

Please identify the general ledger accounts that comprise each line item in the Balance Sheets and Income Statements included in the Company's Telecommunications Company Annual Report filed with the South Carolina Office of Regulatory Staff and/or the Public Service Commission of South Carolina for the years 2003 – 2007.

NO. 2-3

Please identify which general ledger account the Company records its South Carolina and federal USF receipts in to the extent the Company receives USF support.

NO. 2-4

To the extent the Company has any loans outstanding from the Rural Utilities Service' Expedited Telecommunications Loan and Loan Guarantee Program and/or the USDA Rural Development Telecommunications Program either under its Traditional Telephone Loan program or Broadband Access Loan program, please provide the original amount of the loan or loans, the stated interest rate or rates on the loans, and a description of the projects the funds were used to finance. The Company's response should differentiate between loans used to support projects for the regulated and non-regulated operations of the Company.

Dated this 7th day of November, 2008.

Respectfully submitted,

C. Bradley Hutto, Esquire
Williams & Williams
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and

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Attorneys for Time Warner Cable Information
Services, (South Carolina), LLC

BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
DOCKET NO. 2008-328-C

In Re:

Application of Time Warner Cable Information
Services (South Carolina) LLC, d/b/a Time
Warner Cable to Amend its Certificate of
Public Convenience and Necessity to Provide
Telephone Services in the Service Area of PBT
Telecom, Inc. and for Alternative Regulation

CERTIFICATE OF SERVICE

This is to certify that I, Leslie Allen, a legal assistant with the law firm of Robinson, McFadden & Moore, P.C., have this day caused to be served upon the person(s) named below **Time Warner Cable Information Services 2nd Discovery Requests to PBT Telecom, Inc.** in the foregoing matter by causing a copy of same to be delivered as follows:

VIA HAND DELIVERY

M. John Bowen, Jr. Esquire
Margaret M. Fox, Esquire
McNair Law Firm, PA
1301 Gervais Street
Columbia, South Carolina 29201

VIA US MAIL

Nanette S. Edwards, Esquire
Jeffrey M. Nelson, Esquire
Office of Regulatory Staff
P.O. Box 11263
Columbia, SC 29211

Dated at Columbia, South Carolina this 7th day of November, 2008.



Leslie Allen